

FILED

UNITED STATES DISTRICT COURT

DEC 04 2020

for the
WESTERN District of TEXASCLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY 8 DEPUTY CLERKUnited States of America
v.

Case No. SA-20-MJ-

1494

William Joseph Varela-Euceda (1)
Jose Luis Martinez-Velasquez (2)
Martin Garcia-Andrade (3)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2, 2020 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

8/1324(a)(1)(A)(iii) & (v)(1)

Harboring and Conspiracy to Transport Illegal Aliens.

PENALTIES: Up to 10 Years Imprisonment, \$250,000 Fine, 3 years
Supervised Release, \$100 Mandatory Special Assessment.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

- ☐
- Sworn to before me and signed in my presence.
-
- ☒
- Sworn to telephonically and signed electronically.

Date: 12/3/2020City and state: San Antonio, TexasBRIAN M DAVISBROTHERS Digitally signed by BRIAN M DAVISBROTHERS
Date: 2020.12.03 15:27:30 -06'00'

Complainant's signature

HSI S/A Brian Davis-Brothers

Printed name and title

2020.12.03

18:02:05

Judge's signature 06'00'

Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

Being duly sworn, I declare that the following is true and correct to the best of my knowledge.

My name is Brian Davis-Brothers and I am a Special Agent with Homeland Security Investigations, currently assigned to the San Antonio office. I have been employed with HSI for approximately 9 years. Prior to my assignment to HSI, I served as an Immigration Enforcement Agent with Immigration and Customs Enforcement / Enforcement and Removal Operations for 4 years. I have received training in immigration law enforcement both with HSI and ICE/ERO. I have had extensive experience enforcing immigration law, both administrative and criminal.

On December 2, 2020, the San Antonio Police Department responded to the Camino Vista Motel located at 409 Enrique M Barrera Pkwy after a male asked by telephone for a welfare check on his nephew, Y.V.-S. The man stated that Y.V.-S. was brought into the United States by a male and that the male was asking for an additional \$5,000 to continue transporting the nephew to his destination. The man provided the address of the motel where he thought the nephew was being held.

SAPD officers responded to the motel and knocked on the door of room 112 at the Camino Vista Motel. While there, they encountered seven subjects, including William Joseph VARELA-Euceda, Jose Luis MARTINEZ-Velasquez, Martin GARCIA-Andrade, Y.V.-S., R.G.-R., and two other males. SAPD officers determined that the group represented a possible human smuggling attempt and contacted Homeland Security Investigations.

HSI Special Agents arrived to investigate and interviewed the subjects. VARELA, MARTINEZ, and GARCIA all claimed to be hanging out and drinking. None satisfactorily explained how they knew Y.V.-S. or R.G.-R., however, and they all had conflicting stories on how the night's events had proceeded.

Meanwhile, Y.V.-S. and R.G.-R. both stated that they are citizens of Honduras who illegally entered the United States and had stayed at a series of stash houses. Both Y.V.-S. and R.G.-R. said that they had walked around a Border Patrol checkpoint before being picked up by VARELA. Y.V.-S. and R.G.-R. said VARELA drove them to the motel room in San Antonio where MARTINEZ and GARCIA were. Y.V.-S. and R.G.-R. said MARTINEZ took their phones from them and that MARTINEZ and GARCIA watched them while they were in the motel room.

The above facts show probable cause to believe that VARELA, MARTINEZ, and GARCIA harbored illegal aliens and conspired to smuggle aliens, in violation of 8 U.S.C. § 1324(a)(1)(A)(iii) and (v)(1).


BRIAN M
DAVISBROTHERS

Digitally signed by BRIAN M
DAVISBROTHERS
Date: 2020.12.03 15:40:22
-06'00'

Brian Davis-Brothers
Special Agent
Homeland Security Investigations

Subscribed and sworn to me the 3rd of December, 2020.

2020.12.03
18:02:39
-06'00'


Henry J. Bemporad
United States Magistrate Judge